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15	Attorneys for Plaintiffs	
	Oracle USA, Inc., Oracle America, Inc., and	
16	Oracle International Corp.	
17	•	
17		
18	UNITED STATES	S DISTRICT COURT
10	DISTRICT OF	NEVADA
19	DISTRICTOR	NEVADA
20	ORACLE USA, INC., a Colorado corporation;	CASE NO. 2:10-cv-0106-LRH-PAL
	ORACLE AMERICA, INC., a Delaware	
21	corporation; and ORACLE INTERNATIONAL	DECLARATION OF KIERAN P.
22	CORPORATION, a California corporation,	RINGGENBERG IN SUPPORT OF PLAINTIFFS ORACLE'S OPPOSITION
22	Plaintiffs,	TO DEFENDANTS RIMINI STREET
23	V.	INC.'S AND SETH RAVIN'S MOTION
		TO BIFURCATE
24	RIMINI STREET, INC., a Nevada corporation;	
25	SETH RAVIN, an individual,	Judge: Hon. Larry R. Hicks
25	Defendants.	
26	Detenuants.	
	_	1
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2 0		

1	I. Kieran P	. Ringgenberg,	declare as	follows:

- 2 1. I am an attorney admitted to practice law in the State of California and before the
- 3 Court in this action *pro hac vice*. I am a partner with Boies, Schiller & Flexner LLP, counsel to
- 4 plaintiffs in this action. This declaration is made in support of Plaintiffs Oracle USA, Inc.,
- 5 Oracle America, Inc., and Oracle International Corporation's (collectively "Oracle") Opposition
- 6 to Defendants Rimini Street Inc.'s and Seth Ravin's Motion Bifurcate. Based on my
- 7 involvement in the discovery process and my review of the files and records in this action, I
- 8 have firsthand knowledge of the contents of this declaration and could testify thereto.
- 9 2. Attached to the Appendix of Exhibits in Support of Oracle International
- 10 Corporation's Opposition to Rimini Street Inc.'s and Seth Ravin's Motion to Bifurcate
- 11 ("Appendix") as Exhibit 1 is a true and correct copy of an email from Dan Slarve to Seth Ravin,
- dated March 30, 2006, which has been marked as PTX 2.
- 3. Attached to the Appendix as Exhibit 2 is a true and correct copy of email from
- 14 Doug Baron to Dennis Chiu, copying George Lester, which has been marked as PTX 13.
- 4. Attached to the Appendix as Exhibit 3 is a true and correct copy of an email from
- 16 Shelley Blackmarr to Beth Lester, copying Susan Tahtaras, dated March 6, 2007, which has been
- **17** marked as PTX 1585.
- 18 5. Attached to the Appendix as Exhibit 4 is a true and correct copy of an email from
- 19 Susan Tahtaras to Beth Lester, dated March 22, 2007, which has been marked as PTX 14.
- 20 6. Attached to the Appendix as Exhibit 5 is a true and correct copy of an email from
- 21 Dennis Chiu to George Lester, copying Beth Lester, dated April 10, 2007, which has been
- marked as PTX 17.
- 23 7. Attached to the Appendix as Exhibit 6 is a true and correct copy of an email from
- 24 Dennis Chiu to George Lester, copying Seth Ravin, Michael Davichick, dated May 31, 2007,
- which has been marked as PTX 20.
- 26 8. Attached to the Appendix as Exhibit 7 is a true and correct copy of an email from
- 27 Seth Ravin to George Lester, dated June 20, 2007, which has been marked as PTX 21.
- 28 9. Attached to the Appendix as Exhibit 8 is a true and correct copy of an email from

- 1 Dennis Chiu to Seth Ravin, copying George Lester and Thomas Shay, dated June 21, 2007,
- which has been marked as PTX 22.
- 3 10. Attached to the Appendix as Exhibit 9 is a true and correct copy of an email from
- 4 Rich Hughes to Trey Picard, dated June 25, 2007, which has been marked as PTX 24.
- 5 11. Attached to the Appendix as Exhibit 10 is a true and correct copy of an email
- 6 from Dennis Chiu to Seth Ravin, copying George Lester and Thomas Shay, dated July 5, 2007,
- 7 which has been marked as PTX 27.
- 8 12. Attached to the Appendix as Exhibit 11 is a true and correct copy of an email
- 9 from Rusty Gaston to Michael Davichick, dated August 17, 2007, which has been marked as
- **10** PTX 4937.
- 11 13. Attached to the Appendix as Exhibit 12 is a true and correct copy of a Rimini
- 12 Street's Response to Request for Proposal prepared for Abilene Independent School District,
- dated October 25, 2007, which has been marked as PTX 2140.
- 14. Attached to the Appendix as Exhibit 13 is a true and correct copy of an email
- 15 from Dennis Chiu to Seth Ravin and Brian Slepko, copying Michael Davichick and Beth Lester,
- dated February 13, 2008, which has been marked as PTX 601.
- 17 15. Attached to the Appendix Exhibit 14 is a true and correct copy of an email from
- 18 J.R. Corpuz to Doug, dated June 27, 2008, which has been marked as PTX 34.
- 19 16. Attached to the Appendix as Exhibit 15 is a true and correct copy of an email
- 20 from Seth Ravin to Michael, dated August 25, 2008, which has been marked as PTX 35.
- 21 17. Attached to the Appendix as Exhibit 16 is a true and correct copy of an email
- 22 from Michael Davichick to Jim Ward, dated August 25, 2008, which has been marked as PTX
- **23** 36.
- 24 18. Attached to the Appendix as Exhibit 17 is a true and correct copy of an email
- 25 from Susan Tahtaras to Tim Conley, dated November 14, 2008, which has been marked as
- **26** PTX 40.
- 27 19. Attached to the Appendix as Exhibit 18 is a true and correct copy of an email
- 28 from John Whittenbarger to Dennis Chiu, copying Brian Slepko, dated November 21, 2008,

- 1 which has been marked as PTX 42.
- 2 20. Attached to the Appendix as Exhibit 19 is a true and correct copy of an email
- 3 from Brian Slepko to Seth Ravin, dated November 25, 2008, which has been marked as
- **4** PTX 229.
- 5 21. Attached to the Appendix as Exhibit 20 is a true and correct copy of an email
- 6 from Susan Tahtaras to David Radtke, dated December 15, 2008, which has been marked as
- **7** PTX 41.
- 8 22. Attached to the Appendix as Exhibit 21 is a true and correct copy of an email
- 9 from Chris Limburg to Krista Williams, dated February 11, 2009, which has been marked as
- **10** PTX 53.
- 11 23. Attached to the Appendix as Exhibit 22 is a true and correct copy of an email
- 12 from Michael Davichick to Chip Seigel and Kim Cabada, dated May 8, 2009, which has been
- marked as PTX 56.
- 14 24. Attached to the Appendix as Exhibit 23 is a true and correct copy of an email
- 15 from Krista Williams to Dennis Chiu, dated July 14, 2009, which has been marked as PTX 57.
- 16 25. Attached to the Appendix as Exhibit 24 is a true and correct copy of and email
- 17 from Brian Slepko to Dennis Chiu, dated July 17, 2009, which has been marked as PTX 58.
- 18 26. Attached to the Appendix as Exhibit 25 is a true and correct copy of an email
- 19 from Ray Grigsby to Conrad Bredleau, et. al., dated October 17, 2009, which has been marked as
- **20** PTX 61.
- 21. Attached to the Appendix as Exhibit 26 is a true and correct copy of an email
- from Krista Williams to Dennis Chiu, dated January 12, 2010, which has been marked as
- **23** PTX 63.
- 24 28. Attached to the Appendix as Exhibit 27 is a true and correct copy of an email
- 25 from Ed Freeman to Krista Williams, dated January 13, 2010, which has been marked as
- **26** PTX 64.
- 27. Attached to the Appendix as Exhibit 28 is a true and correct copy of excerpts
- 28 from the deposition of Krista Williams, taken on October 5, 2011.

1	30.	Attached to the Appendix as Exhibit 29 is a true and correct copy of excerpts		
2	from the dep	osition of CKE Restaurants, Inc.'s corporate representative, Kim Cabada, taken on		
3	November 3,	November 3, 2011.		
4	31.	Attached to the Appendix as Exhibit 30 is a true and correct copy of excerpts		
5	from the dep	osition of City of Flint, Michigan's designated representative, Thomas O'Brien,		
6	taken on Nov	vember 7, 2011.		
7	32.	Attached to the Appendix as Exhibit 31 is a true and correct copy of excerpts		
8	from the dep	osition of Wendy's International, Inc.'s corporate representative, James Ward, taken		
9	on November 15, 2011.			
10	33.	Attached to the Appendix as Exhibit 32 is a true and correct copy of excerpts		
11	from the dep	osition of Japan Pacific Travel Service, Inc.'s corporate representative, Ronald		
12	Higa, taken on November 21, 2011.			
13	34.	Attached to the Appendix as Exhibit 33 is a true and correct copy of excerpts		
14	from the dep	osition of YUM! Restaurant Services, Inc.'s corporate representative, Charlie		
15	Tewell, taker	n on December 9, 2011.		
16				
17	I decl	are that the foregoing is true under penalty of perjury of the laws of the United		
18	States.			
19	Executed this 16th day of July, 2015, at Oakland, California.			
20				
21		/s/ Kieran Ringgenberg		
22		Kieran Ringgenberg		
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1	ATTESTA	ATION	OF FILER
2	The signatory to this document is Kieran Ringgenberg, and I have obtained Mr.		
3	Ringgenberg's concurrence to file this document on his behalf.		
4	Dated: July 16, 2015		BOIES, SCHILLER & FLEXNER LLP
5		By:	/s/ Steven C. Holtzman
6 7			Steven C. Holtzman, Esq. (pro hac vice) 1999 Harrison Street, Suite 900 Oakland, CA 94612 Telephone: (510) 874-1000
8 9			Facsimile: (510) 874-1460 kringgenberg@bsfllp.com
9 10			Attorneys for Plaintiffs
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1	<u>CERTIFICATE OF SERVICE</u>	
2	I hereby certify that on the 16th day of July, 2015, I electronically transmitted the	
3	foregoing DECLARATION OF KIERAN P. RINGGENBERG IN SUPPORT OF	
4	PLAINTIFFS ORACLE'S OPPOSITION TO DEFENDANTS RIMINI STREET INC.'S	
5	AND SETH RAVIN'S MOTION BIFURCATE to the Clerk's Office using the CM/ECF	
6	System for filing and transmittal of a Notice of Electronic Filing to all counsel in this matter; all	
7	counsel being registered to receive Electronic Filing.	
8		
9	/s/ Catherine Duong	
10	An employee of Boies, Schiller & Flexner LLP	
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